

Powertech comments resulting in updating the CEA document:

Powertech Comment C45 on CEA p. 104

In the 1st paragraph, the statement is made that “the NRC ... did not use the most recent regulatory-approved version of the [AERMOD and CALPUFF] model software platforms.” The AERMOD version used by IML Air Science (IML) in the project modeling was updated by IML’s software vendor, Lakes Environmental, multiple times after the original modeling protocol was developed. As a practical matter, any model version is likely to be out of date by the time an EIS is published. This is particularly true when follow-up model runs are required. The important consideration is that the versions of AERMOD and its associated software tools were current and mutually compatible when the model was implemented, and that to preserve comparability the model was not changed mid-stream. Powertech requests updating the discussion to document that the versions of AERMOD and its associated software tools were current and mutually compatible when the model was implemented.

Reply:

Ex. 5 Deliberative Process (DP)

In the 3rd paragraph, the statement is made that “the approach used by NRC will not account for the diesel engine exhaust PM10 particles that will not settle out as quickly as the mechanically generated fugitive dust emissions.” Most of the non-fugitive sources of particulate emissions at Dewey-Burdock are diesel engines. EPA is correct that some error may be introduced by including combustion sources of PM10 in the dry depletion runs. Most particulate matter in diesel exhaust falls within the PM2.5 category and exhibits a much slower deposition rate than PM10. Nonetheless, fugitive sources are dominant at Dewey-Burdock, where diesel exhaust constitutes only 1% of the total PM10 emissions. For this reason, and to avoid further complicating the final model run, IML grouped all PM10 sources together. Powertech requests that EPA update this discussion in light of the evidence presented in this comment.

Ex. 5 Deliberative Process (DP)